

Exhibit “24”

to the Affirmation of Sean P. Carter Transmitting Evidence in Support of Plaintiffs’
Memorandum of Law in Opposition to the Motion to Dismiss of the Kingdom of Saudi Arabia
and Saudi High Commission for Relief of Bosnia & Herzegovina

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re: Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to: All Actions

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Exhibit 157 – Diplomatic Cable, U.S. Embassy Riyadh, *APHSCT Townsend February 6 Meeting With Foreign Minister Prince Saud Al-Faisal*, February 24, 2007. Averment at ¶ 400.

Exhibit 158 – Diplomatic Cable, U.S. Embassy Skopje, *Macedonia: A/S O’Brien Visit Highlights Terrorism Financing Issues*, August 22, 2007. Averment at ¶ 401.

Exhibit 159 – Diplomatic Cable, U.S. Embassy Dhaka, *International Islamic Relief Organization (IIRO) Seeks to Access Funds Frozen by Islami Bank Bangladesh*, November 3, 2008. Averment at ¶ 402.

Exhibit 160 – U.S. Treasury Department Designates Director, Branches of Charity Bankrolling Al Qaida Network, August 3, 2006. Averment at ¶¶ 403, 404.

Exhibit 161 – Diplomatic Cable, U.S. Embassy Riyadh, *Terrorism Finance: Saudi Response of IIRO’s Al-Mua’jjil UNSCR 1267 Designation*, August 14, 2006. Averment at ¶ 405.

Exhibit 162 – Diplomatic Cable, U.S. Embassy Riyadh, *Scenesetter: APHSCT Townsend Visit to Saudi Arabia, 4-7 November 2006*, October 24, 2006. Averment at ¶ 405.

Exhibit 163 – Diplomatic Cable, U.S. Consulate Jeddah, *International Islamic Relief Organization – Designated by UN 1267 and US Treasury – Issues Letter of Congratulations to President Obama*, March 2, 2009. Averment at ¶ 406.

Exhibit 164 – Affirmation of Evan F. Kohlman, *In Re: Terrorist Attacks on September 11, 2001*, MDL Case No. 1:03-md-01570, April 22, 2010. Averment at ¶¶ 408-418, 531.

Exhibit 165 – Associated Press, *Pakistan Deporting 89 Arab Aid Workers*, October 6, 2001. Averment at ¶¶ 420, 554.

Exhibit 166 – International Islamic Relief Organization Pakistan Branch, Verification of Receipts and Payments for the Period From January 1, 1996 to February 22, 2001, Ford Rhodes Sidat Hyder & Co. Chartered Accountants (A Member of Ernst & Young International) [The “audit” of the IIRO-Pakistan branch, dated just a few months before the September 11th attacks, uncovered the apparent diversion of millions of dollars of funds by that branch, and the wholesale fabrication of invoices, receipts and entire projects to conceal that activity. This is the

same branch office that was used by the IIRO to fund 6 al Qaeda training camps, according to the 1996 CIA Report at Exhibit 95.]. Averment at ¶ 420.

Exhibit 167 – *Investigating Patterns of Terrorism Financing*, Hearing Before the U.S. House Committee on Financial Services Subcommittee on Oversight and Investigations (February 12, 2002), Testimony of Steven Emerson. Averment at ¶ 423.

Exhibit 168 – U.S. Department of Defense, JTF-GTMO Matrix of Threat Indicators for Enemy Combatants. Averment at ¶ 427.

Exhibit 169 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Samir N. al Hasan (ISN No. 043), October 13, 2006, March 4, 2008. Averment at ¶¶ 427, 428.

Exhibit 170 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Rashed Awad Khalaf Balkhair (ISN No. 186), May 27, 2005, June 28, 2006. Averment at ¶ 429.

Exhibit 171 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Said Muhammad Husayn Qahtani (ISN No. 200), September 21, 2004, July 1, 2005, August 12, 2006, January 5, 2009. Averment at ¶¶ 430, 512.

Exhibit 172 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdallah Ibrahim al Rushaydan (ISN No. 343), September 10, 2004, April 12, 2005, April 19, 2005. Averment at ¶¶ 431, 432.

Exhibit 173 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Rashid Abd al Muslih Qaida al Qaid (ISN No. 344), September 30, 2004, May 13, 2005, June 24, 2005. Averment at ¶ 433.

Exhibit 174 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Ghanim Abd al Rahman Ghanim al Huwaymadi al Harbi (ISN No. 516), October 25, 2005, June 23, 2006, June 5, 2007. Averment at ¶ 434.

Exhibit 175 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Tariq Mahmoud Ahmed al Sawah (ISN No. 535), January 16, 2008, September 30, 2008. Averment at ¶¶ 435, 436.

Exhibit 176 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Ahmed Hassan Jamil Suleyman (ISN No. 662), June 18, 2004, March 28, 2005. Averment at ¶ 437.

Exhibit 177 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdul Latif Elbanna (ISN No. 905), May 15, 2005, August 26, 2005. Averment at ¶ 438.

Exhibit 178 – Declaration of Mutaz Saleh Abu Unuq, Financial Director of the World Assembly of Muslim Youth, April 7, 2003. Averment at ¶ 441.

Exhibit 179 – *Saudi Arabia: Friend or Foe in the War on Terror*, Hearing Before the U.S. Senate Judiciary Committee (November 8, 2005), Testimony of Steven Emerson. Averment at ¶ 442.

Exhibit 180 – *Terrorism Financing: Origination, Organization, and Prevention*, Hearing Before the U.S. Senate Committee on Governmental Affairs (July 31, 2003), Prepared Testimony of Steven Emerson and Jonathan Levin. Averment at ¶¶ 445, 464, 533, 553.

Exhibit 181 – *Persecution of Christians Worldwide*, Hearing Before the U.S. House Subcommittee on International Operations and Human Rights (February 15, 1996), Written Statement of James B. Jacobson. Averment at ¶ 446.

Exhibit 182 – World Assembly of Muslim Youth, *Islamic Camps: Objectives, Program Outlines, Preparatory Steps*. Averment at ¶ 446.

Exhibit 183 – Chris Hedges, *Muslims From Afar Joining ‘Holy War’ in Bosnia*, New York Times, December 5, 1992. Averment at ¶¶ 449, 450.

Exhibit 184 – U.S. Treasury Department Designates Two Individuals With Ties to Al Qaida, UBL Former BIF Leader and Al Qaida Associate Named Under E.O. 13224, December 21, 2004. Averment at ¶ 450.

Exhibit 185 – *U.S. Links Bin Laden to Chechnya*, NBC News, August 1999. Averment at ¶ 453.

Exhibit 186 – India Today Magazine, *SIMI: Bitter With India, Safdar Nagori, SIMI’s Secretary General Speaks to Sayantan Chakravarty*, August 20, 2008. Averment at ¶ 457.

Exhibit 187 – *Terrorism, Al Qaeda, and the Muslim World; The Challenge Within the Muslim World*, Hearing before the National Commission on Terrorist Attacks Upon the United States, Testimony of Steven Emerson, July 9, 2003. Averment at ¶¶ 445, 446, 460, 461, 464.

Exhibit 188 – Jerry Markon, *U.S. Raids N. Va. Office of Saudi-Based Charity*, Washington Post, June 2, 2004. Averment at ¶ 462.

Exhibit 189 – Sarah Boesveld, *Canadian Muslim Youth Group Tied to Al-Qaeda Stripped of Charitable Status*, National Post, March 6, 2012. Averment at ¶¶ 466-471.

Exhibit 190 – August 23, 2011 letter from the Canada Revenue Agency to Mr. Ayman al Taher, President of the World Assembly of Muslim Youth, regarding the “Audit of the World Assembly of Muslim Youth.” Averment at ¶¶ 466-471.

Exhibit 191 – January 5, 2012 letter from the Canada Revenue Agency to Mr. Ayman al Taher, President of the World Assembly of Muslim Youth, regarding the “Notice of Intention to Revoke the World Assembly of Muslim Youth.” Averment at ¶¶ 466-471.

Exhibit 192 – U.S. Treasury Department Designates Benevolence International Foundation and Related Entities as Financiers of Terrorism, November 19, 2002.

Exhibit 193 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mammam Ameer (ISN No. 939), April 13, 2005, July 25, 2005. Averment at ¶ 474.

Exhibit 194 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Adel Hassan Hamed (ISN No. 940), November 19, 2004, March 25, 2005 Averment at ¶ 475.

Exhibit 195 – Affidavit of Khalid bin Obaid Azzahri, Financial and Administrative Manager of Al Haramain Islamic Foundation, April 7, 2004. Averment at ¶ 478.

Exhibit 196 – Sharon LaFraniere, *How Jihad Made its Way to Chechnya; Secular Separatist Movement Transformed by Militant Vanguard*, Washington Post, April 26, 2003. Averment at ¶¶ 478, 482.

Exhibit 197 – Statement by Sheikh Muhmad al Tujri, Chairman of the Al Haramain Islamic Foundation's Africa Committee, www.alharamain.org. Averment at ¶ 478.

Exhibit 198 – National Commission on Terrorist Attacks Upon the United States, Monograph on Terrorist Financing, Chapter 7, *Al Haramain Case Study*, pp. 114-130. Averment at ¶ 479.

Exhibit 199 – Diplomatic Cable, Secretary of State, *Terrorism Financing: Updated Nonpaper on Al Haramain*, January 28, 2003. Averment at ¶ 480.

Exhibit 200 – Republic Secretariat for Relations with the International Criminal Tribunal in the Hague and War Crimes Research, *Terrorism: Global Network of Islamic Fundamentalists – Part I – Modus Operandi – Model Bosnia*, April 2004. Averment at ¶ 481.

Exhibit 201 – Remarks by U.S. Treasury Department Secretary Paul O'Neill on New U.S.-Saudi Arabia Terrorist Financing Designations, March 11, 2002. Averment at ¶ 483.

Exhibit 202 – U.S. Treasury Department Executive Order 13224 designation summaries for Al Haramain Islamic Foundation's branch offices. Averment at ¶ 483.

Exhibit 203 – U.S. Treasury Department Announces Joint Action with Saudi Arabia Against Four Branches of Al-Haramain in the Fight Against Terrorist Financing, January 22, 2004. Averment at ¶¶ 484-487, 502.

Exhibit 204 – Additional Al-Haramain Branches, Former Leader Designated by Treasury as Al Qaida Supporters, Treasury Marks Latest Action in Joint Designation with Saudi Arabia, June 2, 2004. Averment at ¶¶ 488-490.

Exhibit 205 – U.S. Treasury Department Executive Order 13224 Designation Memorandum for Al Haramain Islamic Foundation's branch offices in Afghanistan, Albania, Bangladesh, Ethiopia and The Netherlands, and Aqeel Abdelaziz al Aqil. Averment at ¶ 491.

Exhibit 206 – U.S.-Based Branch of Al Haramain Foundation Linked to Terror, Treasury Designated U.S. Branch, Director, September 9, 2004. Averment at ¶¶ 492, 502.

Exhibit 207 – Diplomatic Cable, U.S. Embassy Riyadh, *Terrorism Finance: UNSC 1267 Designee, Suliman al-Buthe, Featured in Local Press, Still on SAG Payroll*, October 17, 2006. Averment at ¶ 492.

Exhibit 208 – Internal Revenue Service Form 990 for Al Haramain Islamic Foundation, Inc. (2001). Averment at ¶ 493.

Exhibit 209 – Excerpts from the Articles of Incorporation of Al Haramain Islamic Foundation, Inc., February 11, 1999. Averment at ¶ 493.

Exhibit 210 – *In the Matter of the Search of One Story Residential Building Located at 3800 S. Highway 99 in Ashland, Oregon*, Application and Affidavit of Colleen Anderson, Special Agent, Internal Revenue Service, Criminal Investigation, February 13, 2004. Averment at ¶¶ 495-500.

Exhibit 211 – Transcript, *U.S. v. Usama Bin Laden*, Case No. S(7) 98 Cr. 1023, May 1, 2001. Averment at ¶ 502.

Exhibit 212 – Transcript, *U.S. v. Usama Bin Laden*, Case No. S(7) 98 Cr. 1023, May 2, 2001. Averment at ¶ 502.

Exhibit 213 – U.S. Treasury Department Designated Al Haramain Islamic Foundation, June 19, 2008. Averment at ¶ 503.

Exhibit 214 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Zaid Muhammad Sa'ad al Husayn (ISN No. 050), April 2, 2005, December 5, 2005, February 23, 2006. Averment at ¶ 509.

Exhibit 215 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdel Hadi Mohammed Badan al Sebail Sebail (ISN No. 064), September 25, 2004, May 13, 2005, July 18, 2005. Averment at ¶ 510.

Exhibit 216 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Abdul Rahman Owaid Mohammad al Juaid (ISN No. 179), September 27, 2004, September 20, 2005, May 1, 2006, March 3, 2007. Averment at ¶ 511.

Exhibit 217 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Fahd Muhammad Abdullah al Fouzan (ISN No. 218), February 27, 2006, February 14, 2007. Averment at ¶ 513.

Exhibit 218 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Wasm Awad Umar Wasim (ISN No. 338), October 7, 2004, July 11, 2005, February 17, 2006, April 6, 2006. Averment at ¶ 514.

Exhibit 219 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Sami al Haj (ISN No. 345), July 8, 2005, September 4, 2006, September 11, 2007, April 4, 2008. Averment at ¶ 515.

Exhibit 220 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Jamal Muhammad Alawi Mari (ISN No. 577), September 22, 2004, October 26, 2005, November 25, 2006, January 11, 2008, May 5, 2008. Averment at ¶¶ 516, 517.

Exhibit 221 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Khalid Mahomoud Abdul Wahab al Asmr (ISN No. 589), March 6, 2004 November 9, 2004. Averment at ¶ 518.

Exhibit 222 – Declaration of Dr. Mutlib bin Abdullah al Nafissa, Member of the Council of Ministers, January 31, 2004. Averment at ¶ 521.

Exhibit 223 – Declaration of Saud bin Mohammad al Roshood, Director of the Executive Office of the Saudi High Commission, February 17, 2004. Averment at ¶ 522.

Exhibit 224 – Declaration of Ali Ahmad Ali Hamad, March 4, 2008 (English and Arabic). Averment at ¶¶ 525-527.

Exhibit 225 – Recorded Witness Statement of Ali Ahmad Ali Hamad, March 4, 2008. Averment at ¶¶ 525-527.

Exhibit 226 – Saudi High Commission Employment Certificate for Ali Ahmad Ali Hamad, December 30, 1996. Averment at ¶¶ 525-527.

Exhibit 227 – Transcript, Testimony of Ali Ahmad Ali Hamad before the International Criminal Tribunal for the Former Yugoslavia (“ICTY”) (September 8, 2007) [Ali Hamad testifies that the Saudi High Commission provided considerable assistance to the Bosnian mujahideen and the “Zubeir” unit that Ali Hamad commanded. According to Ali Hamad: (i) the Zubeir unit was formed by the main al Qaeda cell outside Bosnia-Herzegovina; (ii) al Qaeda made the determination that Hamad would join the Zubeir unit and thus informed him of the decision; (iii) Hamad says that the Zubeir unit was a completely separate mujahedin unit from others in the area; (iv) the Saudi High Commission provided more assistance to the Zubeir unit than other mujahideen units.]. Averment at ¶¶ 525-527.

Exhibit 228 – FBI Report, *Murder of William Arnold Jefferson, November 18, 1995, Interview of Ali Ahmed Ali Hamad*. Averment at ¶¶ 525-527, 532.

Exhibit 229 – Diplomatic Cable, U.S. Embassy Sarajevo, *Terrorist Finance: Bosnia’s Dirty Dozen*, November 2002. Averment at ¶ 528.

Exhibit 230 – Official Record from the Republic of Bosnia and Herzegovina, Ministry of the Interior, State Security Service (“Official Secret”; “Strictly Confidential”), October 23, 1995. Averment at ¶ 529.

Exhibit 231 – Federal Office of Criminal Investigation, Expert Report Concerning the Area – Financial Investigations – Relating to the Judicial Assistance Request, Ref. No. INV/10289/T09-PH (245), dated 8/27/2002 of the “Office of the Prosecutor” (OTP) of the International Court of Criminal Justice for the former Yugoslavia relating to the “Third World Relief Agency” (TWRA), Vienna/Austria (also referred to as the “TWRA Report”), August 8, 2003. Averment at ¶ 530.

Exhibit 232 – Adam Kredo, *Saudi Arabia’s New King Helped Fund Radical Terrorist Groups*, Washington Free Beacon, January 26, 2015. Averment at ¶ 533.

Exhibit 233 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Bensayah Belkacem (ISN No. 10001), September 24, 2004, December 28, 2005, November 19, 2006, April 28, 2008. Averment at ¶¶ 535-539.

Exhibit 234 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Saber Mahfouz Lahmar (ISN No. 10002), September 23, 2004, November 29, 2005, October 25, 2006, April 17, 2008. Averment at ¶ 540.

Exhibit 235 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mohammed Nechle (ISN No. 10003), September 23, 2004, November 17, 2005, November 7, 2006, April 5, 2008. Averment at ¶¶ 541, 554.

Exhibit 236 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mustafa Ait Idr (ISN No. 10004), September 21, 2004, December 7, 2005, November 29, 2006, June 30, 2008. Averment at ¶ 541.

Exhibit 237 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Lakhdar Boumediene (ISN No. 10005), September 21, 2004, November 30, 2005, October 20, 2006, April 1, 2008. Averment at ¶¶ 541, 554.

Exhibit 238 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Boudella al Hajj (ISN No. 10006), October 6, 2004, November 30, 2005, November 20, 2006, May 5, 2008.

Exhibit 239 – Defense Intelligence Agency Report, *IIR [REDACTED] Aided Receives Humanitarian Aid and Weapon Shipments From Saudi Arabian Relief Organization*. Averment at ¶ 542.

Exhibit 240 – Declaration of Abdul Rahman al Swailem, President of the Saudi Arabian Red Crescent Society, April 2, 2004 (ECF No. 96-2). Averment at ¶ 545.

Exhibit 241 – Declaration of Abdul Rahman al Swailem, President of the Saudi Arabian Red Crescent Society, April 2, 2004 (ECF No. 96-3). Averment at ¶ 545.

Exhibit 242 – James Rupert, *Dreams of Martyrdom Draw Islamic Arabs to Join Afghan Rebels*, Washington Post, July 21, 1986. Averment at ¶ 547.

Exhibit 243 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Mohamed Atiq Awayd al Harbi (ISN No. 333), July 5, 2005, April 23, 2006, March 3, 2007. Averment at ¶ 556.

Exhibit 244 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Said Ali al Shihri (ISN No. 372), December 10, 2004, June 16, 2005, April 13, 2007. Averment at ¶ 557.

Exhibit 245 – U.S. Department of Defense Unclassified Summaries of Evidence for Detainee Muhamed Hussein Abdallah (ISN No. 704), December 10, 2004, April 22, 2005, July 26, 2005. Averment at ¶ 558.

Exhibit 246 – High Order No. 7/B/1863 (the “Albanian High Order”), May 19, 1999. Averment at ¶ 559.

Exhibit 247 – Declaration of Dr. Abdulrahman A. Al-Suwailem, President of the Saudi Joint Relief Committee and the Saudi Red Crescent Society, January 10, 2005. Averment at ¶ 560.

Exhibit 248 – U.S. Treasury Department Designates Bosnian Charities Funneling Dollars to Al Qaida, May 6, 2004. Averment at ¶ 562.

Exhibit 249 – U.S. Treasury Department Executive Order 13224 designation summary for Al Haramain Al Masjed Al Aqsa Charity Foundation. Averment at ¶ 562.

Exhibit 250 – INTERPOL Fusion Taskforce Report, *Financing of Terrorism and Charities*, Booklet 3, July 2003. Averment at ¶¶ 564, 565, 571.

Exhibit 251 – INTERPOL Fusion Taskforce Report, *Financing of Terrorism*, March 2003. Averment at ¶ 564.

Exhibit 252 – INTERPOL Fusion Taskforce Report, *Financing of Terrorism and Charities*, Booklet 2, July 2003. Averment at ¶¶ 564, 565.

Exhibit 253 – Stephen Schwartz, *Islamic Fundamentalism in the Balkans*, Partisan Review, August 1, 2000. Averment at ¶ 566.

Exhibit 254 – Fawaz Mohmmad, *Riyadh to Close Charities Oversees*, IslamOnline.net, March 29, 2004. Averment at ¶ 566.

Exhibit 255 – Glenn R. Simpson, *Terror Finance: U.S. Tracks Saudi Bank Favored by Extremists*, Wall Street Journal, July 26, 2007, including Excerpt from 2003 CIA Report. Averment at ¶ 571.

Exhibit 256 – *U.S. Vulnerabilities to Money Laundering, Drugs, and Terrorist Financing: HSBC Case History*, U.S. Senate Permanent Subcommittee on Investigations, July 17, 2012, pp. 193-202. Averment at ¶ 571.

Exhibit 257 – Diplomatic Cable, Secretary of State, *Joint Examination of Al Rajhi Bank Through the Joint Terrorist Financing Task Force*, November 25, 2004. Averment at ¶ 571.

Exhibit 258 – British Intelligence Report [“A most reliable and sensitive source advises that KbM/NCB has channeled funds to OBL on behalf of some of the Saudi Royal family, as insurance against attack on their various assets.”]. Averment at ¶ 572.

Exhibit 259 – *Al Qaeda and Terrorism’s Global Reach*, Hearing before the U.S. House Committee on International Relations, Testimony of Vincent Cannistraro, Former CIA Chief of Counterterrorism Operations and Analysis, October 3, 2001. Averment at ¶ 572.

Exhibit 260 – U.S. Treasury Department Executive Order 13224 Designation Memorandum for Yassin al Kadi (Version #1). Averment at ¶ 572.

Exhibit 261 – U.S. Treasury Department Executive Order 13224 Designation Memorandum for Yassin al Kadi (Version #2). Averment at ¶ 572.

Exhibit 262 – Statement of Yassin Abdullah Kadi, *In the Matter of Yassin Abdullah Kadi and the Office of Foreign Assets Control, U.S. Department of the Treasury*. Averment at ¶ 572.

Exhibit 263 – Memorandum in Support of Defendants’ Motion to Dismiss or in the Alternative, For Summary Judgment, *Yassin Abdullah Kadi v. Timothy Geithner, et al.*, Civil Action No. 09-0108 (JDB), May 22, 2009. Averment at ¶ 572.

Exhibit 264 – November 29, 2001 letter from David D. Aufhauser, Treasury Department General Counsel, to Switzerland’s M. Claude Nicati, Substitut du Procureur General, regarding Yassin A. Kadi. Averment at ¶ 572.

Exhibit 265 – German Internal Intelligence Service, Summary of Findings, Investigation of Yassin Qadi and Muwafaq. Averment at ¶ 572.

Exhibit 266 – Transcript, International Criminal Tribunal for the Former Yugoslavia, Testimony of Ajman Awad, February 8, 2008 [Awad testifies that he went to Bosnia-Herzegovina in December 1992 intending to fight on the side of Bosnian Muslims. To do so, Awad states that he joined Muwafaq: *“In late 1992, I joined the Mowafaq Foundation, humanitarian organisation, and that is the organisation I was a member of when I entered Bosnia and Herzegovina.”* Awad further testifies that there were several *“humanitarian organizations”* he was working with in Rijeka in 1992, including IGASA [International Islamic Relief Organization]]. Averment at ¶ 572.

Exhibit 267 – Transcript, International Criminal Tribunal for the Former Yugoslavia, Testimony of Ajman Awad, February 9, 2008 [Awad again testifies that he came to Bosnia-Herzegovina in late 1992 via the assistance of the Arab humanitarian organization Muwafaq and further states that he received his first uniform from the logistics person of the 7th Muslim Brigade as a gift while he was a member of the humanitarian organization. According to Awad: *“Bosniaks considered every Arab who came to – everyone who came to Bosnia and Herzegovina who wore a uniform and wore a beard, they considered them Mujahedin, to be Mujahedin. And even some people who worked for humanitarian organisations, the people in Bosnia referred to them as El Mujahedin.”*]. Averment at ¶ 572.

Exhibit 268 – Transcript, International Criminal Tribunal for the Former Yugoslavia, Testimony of Ajman Awad, February 10, 2008 [Awad explains that he joined Muwafaq to get into Bosnia to offer his translation services and participate in the fighting. Moreover, Muwafaq was giving him a salary. *“I said that I worked for a humanitarian organisation. I joined the organisation, the Mowafaq foundation, thinking that they were organising training for soldiers in Bosnia and Herzegovina, for Bosniak soldiers in Bosnia and Herzegovina. I wanted to work as an interpreter and translator, and I also wished to participate in the fighting. When I was asked by the director of the humanitarian organisation, the Mowafaq Foundation, who wanted to enter Bosnia or who wanted to go to Bosnia, to be there, and he said that there was a possibility for that, I used that option, and I entered Bosnia and Herzegovina at the expense of the humanitarian organization that I was working for. Excuse me. I was receiving a salary at this*

organisation, so this is what I used to live on.” He further testifies that the “*High Saudi Committee*” was also active in the territory of Zenica, as well as “*Igasa*” (IIRO) and “*Human Relief International.*”]. Averment at ¶ 572.

Exhibit 269 – Foreign Broadcast Information Service Report, *Compilation of Usama Bin Laden Statements, 1994-January 2004* [In a June 17, 1996 interview with Osama bin Laden in Cairo, bin Laden expressed his support for “the Muwaffaq Society in Zagreb.”]. Averment at ¶ 572.

Exhibit 270 – Excerpt from the Muslim World League Journal [advertisements for Saudi Joint Relief Committee bank accounts managed by National Commercial Bank and Al Rajhi Banking & Investment Corporation]. Averment at ¶ 573.

Exhibit 271 – Summary of the Saudi National Commercial Bank Audit Report. Averment at ¶ 574.

Exhibit 272 – U.S. Treasury Department Executive Order 13224 designation summary for Rabita Trust. Averment at ¶ 580.

Exhibit 273 – Glenn R. Simpson, *Saudi Charity Worried French in ‘94*, Wall Street Journal, January 13, 2004. Averment at ¶ 585.